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BENJAMIN, A.		
BRETZKE, J.C.		
BURLINGAME, A.H.		
COPP, B.D.		
CROUCHER, D.W.		
DAVIS, J.G.		
EVERED, J.E.	X	X
FERRERA, D.W.		
FERRIS, L.R.		
FRAIKOR, F.J.		
FRANCIS, G.E.		
GOODWIN, R.		
HANNI, B.J.		
HEALY, T.J.		
IDEKER, E.H.		
JENS, J. P.		
KERSH, J.M.	X	X
KIRBY, W.A.		
KRIEG, D.		
LEE, E.M.		
MAJESTIC, J.R.		
MARX, G.E.		
MATHEWS, T.A.		
McCLUSKY, J.K.		
MEURRENS, B.E.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SAFFELL, B.F.		
SANDLIN, N.B.		
SWANSON, E.R.		
WIEBE, J.S.		
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ZANE, J.O.		

JUL 10 1991

ERD:PMP: 5369

Transmittal of Revised Section D Categorical Exclusion RFO/CX010-91

R. I. Greenberg, Chief Southwestern Decontamination /Decommissioning Branch, EM-453,

Enclosed is a revision of the subject categorical exclusion (CX) for a study of surface soil contamination on OU1 and OU2 at Rocky Flats Plant. The purpose of the project is to define the spatial distribution of Am and Pu in soils on OU1 and OU2, and to study the migration of these elements in the soils under simulated weather conditions. The CX has been revised to incorporate editorial comments received from EM-453.

In response to the technical comments received on the CX, we provide the following information:

Compliance - Refilling the soil excavation pits with the excavated soil does comply with the requirements of CERCLA and other laws and regulations. To do otherwise with the soil would constitute a remedial activity which has not been approved by the regulators. The material is not considered waste as long as it is returned to the excavation.

Good Science - We recognize that the migration of interstitial waters in disturbed soils is not equal to the migration rate in undisturbed soils. However, in order to install samplers to measure interstitial water migration, the soils will have to be disturbed. The resulting differences in the migration rates will be factored into the test results.

Figures 1 and 2 for the CX will be transmitted to Autar Rampertaap under separate cover. Please contact Tricia Powell of my staff at FTS 345-3260 for answers to any other questions about the project.

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Reviewed for Addressee
Corres. Control RFP

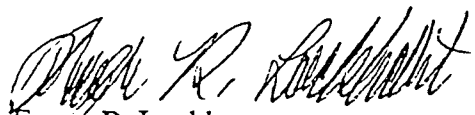
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Attachment

- cc w/attachment:
- A. Rampertaap, EM-453
- L. Lawson, EM-431
- S. Nesta, EG&G/RF


Frazer R. Lockhart
Director
Environmental Restoration Division

ADMIN REVIEWED